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The Honorable James L. Robart

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

HOMESITE INSURANCE COMPANY OF THE MIDWEST, a Wisconsin corporation,

Plaintiff,

v.

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MATTHEW ALVARADO, a Washington resident; HEATHER ALVARADO, a Washington resident; and JENNIFER HUERTA, a Washington resident,

Defendants.

NO. 2:20-cv-01709-JLR

STIPULATED MOTION TO EXTEND TIME RE: INITIAL SCHEDULING DATES, AND TROPOSED ORDER

NOTE ON MOTION CALENDAR: January 22, 2021

Homesite Insurance Company of the Midwest ("Homesite"), along with Defendants Matthew Alvarado and Heather Alvarado (collectively, the "Alvarados"), and Defendant Jennifer Huerta ("Ms. Huerta") (collectively, the "Parties), by and through their undersigned attorneys, respectfully submit this Stipulated Motion to Extend Time re: Initial Scheduling Dates, and [Proposed] Order.

The Parties attended mediation in the Underlying Lawsuit on January 11, 2021. The Parties were unable to reach an agreement at the mediation, but continue settlement discussions, which could alleviate further proceedings in this coverage action.

STIPULATED MOTION TO EXTEND TIME RE: INITIAL SCHEDULING DATES, AND [PROPOSED] ORDER - 1

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The Parties held an initial FRCP 26(f) Conference on January 21, 2021 and discussed the need to extend the remaining Initial Scheduling Dates by two (2) weeks. They agree to an extension of the below deadlines to allow the settlement process to continue.

The Parties submit that the above shows good cause to extend these deadlines as set forth below. The Parties agree, and respectfully request, that the Initial Scheduling Dates be extended as follows:

Event	Current Deadline	Proposed Deadline
Initial Disclosures Pursuant to FRCP 26(a)(1):	February 5, 2021	February 22, 2021
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and LCR 26(f):	February 12, 2021	February 22, 2021

STIPULATED TO AND DATED this 22nd day of January, 2021.

s/ Eliot M. Harris
Eliot M. Harris, WSBA # 36590
s/ Miles J. M. Stewart
Miles J. M. Stewart, WSBA # 46067
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s/ William A. Kinsel
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STIPULATED MOTION TO EXTEND TIME RE: INITIAL SCHEDULING DATES, AND [PROPOSED] ORDER - 2

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1 s/Roger S. Davidheiser Roger S. Davidheiser, WSBA # 18638 2 FRIEDMAN | RUBIN PLLP 1109 1st Avenue, Suite 501 3 Seattle, WA 98101 (206) 501-4446 Tel: 4 Email: rdavidheiser@friedmanrubin.com 5 Attorneys for Defendant 6 Jennifer Huerta 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25

STIPULATED MOTION TO EXTEND TIME RE: INITIAL SCHEDULING DATES, AND [PROPOSED] ORDER - 3

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ORDER 1 2 Pursuant to stipulation, IT IS SO ORDERED. 3 The remaining Initial Scheduling Dates shall be: 4 **New Deadline Event** Initial Disclosures Pursuant to FRCP 26(a)(1): February 22, 2021 5 Combined Joint Status Report and Discovery February 22, 2021 6 Plan as Required by FRCP 26(f) and LCR 26(f): 7 DATED this 24th day of JAN., 2021. 8 The Honorable James L. Robart 9 10 11 PRESENTED BY: 12 s/Eliot M. Harris Eliot M. Harris, WSBA # 36590 13 s/Miles J. M. Stewart Miles J. M. Stewart, WSBA # 46067 14 WILLIAMS, KASTNER & GIBBS PLLC 601 Union Street, Suite 4100 15 Seattle, WA 98101-2380 16 Tel: (206) 628-6600 (206) 628-6611 Fax: 17 Email: eharris@williamskastner.com mstewart@williamskastner.com 18 19 Attorneys for Plaintiff Homesite Insurance Company of the 20 Midwest 21 22 23 24 25

STIPULATED MOTION TO EXTEND TIME RE: INITIAL SCHEDULING DATES, AND [PROPOSED] ORDER - 4

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STIPULATED MOTION TO EXTEND TIME RE: INITIAL SCHEDULING DATES, AND [PROPOSED] ORDER - 5

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